

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

DALLAS COBBS, #164276,

Plaintiff,

vs.

GEORGE J. PRAMSTALLER, *et al.*,

Defendants.

File No. 07-CV-14644

Hon. Anna Diggs Taylor

Mag. Judge Charles E. Binder

**Plaintiff's Response to MDOC and CMS
Defendants' Motions for Summary Judgment**

INDEX OF EXHIBITS

- Exhibit A: Updated Declaration of Plaintiff Dallas Cobbs (12/09)
- Exhibit B: MDOC Policy Directives and Operating Procedures
- Exhibit C: Dallas Cobbs' Medical Records¹
- Exhibit D: Dallas Cobbs' Grievances and Responses
- Exhibit E: Dallas Cobbs' Health Care Requests (Kites) and Letters
- Exhibit F: Deposition of Dr. Michael McGrath, O.D.
- Exhibit G: Deposition of Paul Piper, M.D.
- Exhibit H: Deposition of George Pramstaller, M.D.
- Exhibit I: Deposition of Craig Hutchinson, M.D.
- Exhibit J: Deposition of Utilization Review Nurse Brenda Jones
- Exhibit K: MDOC Defendants' Response to Interrogatory re. John Does
- Exhibit L: CMS Care Enhance Computer Medical Records

¹ These documents are not filed under seal with the plaintiff's permission, because he wants the public to be able to see what happened to him. Data subject to identity theft has been redacted pursuant to Local Rule 5.3 and Fed. R. Civ. P. 5.2.

- Exhibit M: Declaration of Ophthalmologist Ghulam Dastgir, M.D., and Letters Supplied to MDOC re. Surgical Risks of Late Cataracts
- Exhibit N: Declaration of Ophthalmologist Alan Sugar, M.D.
- Exhibit O: CMS "Pass-Through" List
- Exhibit P: Snellen Eye Chart
- Exhibit Q: *Titlow v. Corrections Medical Services*, 2008 WL 907450 (E.D. Mich. No. 07-CV-12083 (3/31/08)
- Exhibit R: *Castillo v. Dashiell*, 2007 WL 609858, No. CV S-04-0737, at *7 (E.D.Cal., Feb. 27, 2007) (*unpublished case*) (adopted at 2007 WL 933790, No. CV-0737 (E.D. Cal., Mar 27, 2007)

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s/ Brad Smyer
Student Attorney for Plaintiff

s/ Ondrej Staviscak Diaz
Student Attorney for Plaintiff

Dated: December 17, 2009